

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE: BP ERISA LITIGATION

MDL No. 2185

Civil Action No. 4:10-cv-04214

Hon. Keith P. Ellison

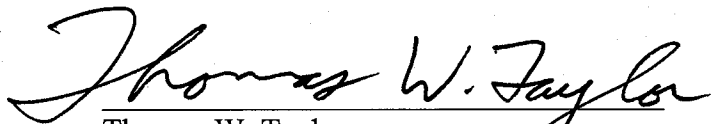
SECOND DECLARATION OF THOMAS W. TAYLOR

Pursuant to 28 U.S.C. § 1746, I, THOMAS W. TAYLOR, declare as follows:

1. I am over twenty-one years of age and I am fully competent to make this Declaration. I have personal knowledge of the facts set forth in this Declaration.
2. I am a partner in the law firm of Andrews Kurth LLP. My office is located at 600 Travis, Suite 4200, Houston, Texas 77002.
3. I am a member in good standing of the State Bar of Texas.
4. I am Attorney-in-Charge for the defendants named in the Consolidated Complaint (Dkt. 57) in the above-captioned matter. I submit this declaration to provide the Court with a document cited in Reply Memorandum in Support of Defendants' Motion to Dismiss, which is being filed on November 7, 2011.
5. Attached hereto as Exhibit T is a true and correct copy of the Eighteenth Amendment of BP Employee Savings Plan (As Amended and Restated Generally Effective as of January 1, 2002), which was bates stamped BPGOM ERISA 0001247-54 in Defendants' document production to Plaintiffs on or about March 9, 2011.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 7th day of November, 2011.

A handwritten signature in cursive script, reading "Thomas W. Taylor". The signature is written in black ink and is positioned above the printed contact information.

Thomas W. Taylor
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